

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

**SECOND AMENDED MASTER SHORT
FORM COMPLAINT FOR DAMAGES
FOR INDIVIDUAL CLAIMS AND
DEMAND FOR JURY TRIAL**

The Plaintiff(s) named below, for their Complaint against Defendants named below, incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc 364). Plaintiff(s) further shows the Court as follows:

1. The Plaintiff is GRACE HILLARY KATHERINE COHAN
2. Plaintiff is a resident of the following town/city, county and state: ORMOND BEACH, VOLUSIA COUNTY, FLORIDA.
3. District Court and Division in which venue would be proper absent direct filing: MIDDLE DISTRICT OF FLORIDA, ORLANDO DIVISION.
4. Defendants: C.R. Bard Inc. and Bard Peripheral Vascular, Inc.
5. Basis of Jurisdiction: Diversity of Citizenship

6. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim: G2 Vena Cava Filter.

7. Date of Implantation as to each product: April 18, 2007.

8. Counts in the Master Complaint brought by Plaintiff(s):

- Count I: Strict Products Liability—Manufacturing Defect
- Count II: Strict Products Liability—Information Defect (Failure to Warn)
- Count III: Strict Products Liability—Design Defect
- Count IV: Negligence—Design
- Count V: Negligence—Manufacture
- Count VI: Negligence—Failure to Recall/Retrofit
- Count VII: Negligence—Failure to Warn
- Count VIII: Negligent Misrepresentation
- Count IX: Negligence per se
- Count X: Breach of Express Warranty
- Count XI: Breach of Implied Warranty
- Count XII: Fraudulent Misrepresentation
- Count XIII: Fraudulent Concealment
- Count XIV: Violations of Applicable Florida Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices
- Punitive Damages

9. Jury Trial demanded for all issues so triable? YES

RESPECTFULLY SUBMITTED this 21st day of April, 2017.

I hereby certify that on this 21st day of April, 2017, I electronically transmitted the attached document to the Clerk's Office using CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

THE MONSOUR LAW FIRM

/s Katharine Gale Krottinger

Katharine Gale Krottinger

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TO BE MOVED PRO HAC VICE

Attorney for Plaintiff

I hereby certify that on this 21st day of April, 2017, I electronically transmitted the attached document to the Clerk's Office using CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s Katharine Gale Krottinger